

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF INDIANA, HAMMOND DIVISION**

Caitlin V. Neal,

Plaintiff,

v.

Operators of the Digital Properties Set Forth in
Exhibit 1,

Defendants.

Case No: 2:24-cv-00263-GSL-AZ

Dist. Judge Gretchen S. Lund

Mag. Judge Abizer Zanzi

Plaintiff's Motion for Leave to File Under Seal

NOW COMES Plaintiff Caitlin V. Neal ("Plaintiff"), by and through Plaintiff's undersigned counsel, hereby requests leave to file the following documents under seal: (i) Exhibit 1 attached to the First Amended Complaint ("FAC"), which lists the identities of the ecommerce merchants who are expected to be defendants in this case ("Defendants") and the digital properties belonging to Defendants [Dkt. 10]; (ii) Exhibit 2 to the FAC, providing WHOIS.com records for various domains controlled and operated by Defendants [Dkt. 11]; and (iii) Exhibit 6 to the FAC, which provides screenshots of Defendants' unauthorized uses of Plaintiff's identity in online advertisements [Dkt. 12]. Plaintiff also requests that corresponding prior filings that had been filed by Plaintiff in relation to the original complaint, [Dkt. 3–5], similarly remain under seal until the documents identified above are unsealed. In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for violation of the Lanham Act and misappropriation of Plaintiff's right of publicity. Sealing these portions of the file is necessary, at the very outset of the case, to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, such as from sellerdefense.cn or other court monitoring services, the likely result would be the destruction of relevant documentary evidence and the hiding or

transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal the above documents.

Dated: November 8, 2024

Respectfully submitted,

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